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November 15, 2023

VIA ECF

Hon. P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 11D
New York, New York 10007

Re: United States of America v. Oleg Vladimirovich Deripaska, et al., 22-CR-00518
(PKC)

Dear Judge Castel:

I represent defendant Natalia Bardakova in the above-referenced matter. On November 3, 2023, on behalf of Ms. Bardakova, I filed a motion to dismiss the indictment. *See* Dkt. No. 34. Since then, I have conferred with AUSA Vladislav Vainberg regarding a briefing schedule. On behalf of both parties, I respectfully request that the Court permit the government to file its brief in opposition to the motion to dismiss on December 21, 2023, and Ms. Bardakova to file her reply brief on January 18, 2024. If this schedule is acceptable to the Court, the parties respectfully request that the Court "so order" this letter. Because Ms. Bardakova is not in the United States, the Speedy Trial clock has not yet begun to run. *See* 18 U.S.C. § 3161(c)(1). I thank the Court for its attention to this matter.

Respectfully submitted,

MORVILLO ABRAMOWITZ
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By: /s/ Robert J. Anello
Robert J. Anello

Counsel to Defendant Natalia Bardakova

cc: AUSA Vladislav Vainberg (by email)

Application GRANTED
SO ORDERED
J. Mustaf
USDC
11-15-23

OK